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March 16, 2005

**VIA E-FILE and HAND DELIVERY**

The Honorable Sue L. Robinson  
U.S. District Court for the District of Delaware  
844 North King Street - Room 4209  
Lock Box 18  
Wilmington, DE 19801

Re. **Tele globe Communications Corporation, et al. v.  
BCE, Inc., et al.; Civil Action No. 04-CV-1266**

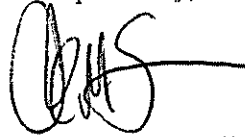
Dear Chief Judge Robinson:

Enclosed for Your Honor's consideration is the Stipulated Order Appointing Special Discovery Master, which has been signed by counsel for all parties. If Your Honor will recall, plaintiffs filed a motion for the appointment of a special discovery master on February 14, 2005 (D.I. 77). Defendants filed a response to that motion on March 1, 2005 (D.I. 86) and consented to the appointment of a special discovery master. Pursuant to the proposed Order, the special master would decide all discovery disputes that arise between the parties, including the fully-briefed motion to compel filed by plaintiffs on February 11, 2005 (D.I. 74).

To alleviate any potential burden on the Court, the parties contacted certain of the special discovery masters utilized by this Court in intellectual property cases. After speaking with counsel, Collins J. Seitz, Jr. has agreed, subject to Your Honor's approval, to serve as special master. Mr. Seitz has approved the attached form of Order.

If Your Honor should have any questions with respect to the proposed Order, counsel remains available at the Court's convenience.

Respectfully,



Chad M. Shandler (#3796)

CS.ps

Enclosure

cc: Clerk of the Court w/ enclosure (via e-file and hand delivery)  
Gregory V. Varallo, Esq. w/ enclosure  
Pauline K. Morgan, Esq. w/ enclosure (via hand delivery)  
Kevin Gross, Esq. w/ enclosure (via hand delivery)

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John P. Amato, Esq w/ enclosure (via facsimile)  
George J. Wade, Esq w/ enclosure (via facsimile)  
Collins J. Seitz, Jr., Esq w/ enclosure (via hand delivery)